



George Latimer
County Executive

Office of the County Attorney

John M. Nonna
County Attorney

Application to file unredacted letter (Doc. 137) under seal granted. The filing shall be made pursuant to my Rule 5(B), specifically, it shall be filed via ECF with the redacted information highlighted.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: New York, New York
July 2, 2020

Hon. Philip M. Halpern
United States District Judge
U.S. District Court
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Suzan Russell v. Westchester Community College, et al.*
16-cv-1712 (PMH)(PED)
Request to File Letter Under Seal

Dear Judge Halpern:

This office represents the Westchester Community College, the County of Westchester, Veronica Delcourt and Heather Ostman (hereinafter collectively referred to as "County Defendants") and respectfully requests permission under Your Honor's Rule 5 to file the letter previously filed as Dkt. No. 137 with redactions under seal without redactions.¹ In this case, Plaintiff claims that she was discriminated on the basis of her alleged disability under the ADA and NYSHRL. In an abundance of caution, County Defendants have redacted certain medical information related to Plaintiff.

If this request is granted, an unredacted copy will be forwarded to Your Honor via email. Should Your Honor's staff have any questions, I can be reached at (914) 995-3577. Thank you.

Respectfully submitted,
JOHN M. NONNA
Westchester County Attorney

By:
Irma Cosgriff (IC 1320)
Associate County Attorney

IWC/st

¹ A redacted version was filed on July 1, 2020 and includes redactions previously made in this action in other correspondence. Plaintiff's counsel previously agreed to these redactions. The attorney for the provider in Texas has agreed to these redactions.

TO: COUNSEL VIA ECF

VIA EMAIL AND REGULAR MAIL

Shane Bebout, Esq.

Todd, Barron, Thomason, Hudman & Bebout, P.C.

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